



October 3, 2016

Mr. Charlie Clark  
Environmental Administrator  
Florida Department of Agriculture and Consumer Services  
3125 Conner Blvd.; Bldg. 6  
Tallahassee, Florida 32399-1650

Dear Mr. Clark:

On behalf the citrus industry in Florida, Third Party Registrations, Inc. is again seeking your assistance in petitioning the EPA for a Section 18 Emergency Exemption (specific) for the continued use of Belay 2.13 SC Insecticide (clothianidin) on young citrus trees to prevent the introduction of the causal agent *Candidatus Liberbacter asiaticus* [Huanglongbing (HLB) or citrus greening disease] by its insect vector the Asian Citrus Psyllid (*Diaphorina citri*). The citrus industry continues to struggle with management of the incidence and severity of this invasive disease and vector complex, and it remains apparent that the future of the industry is at risk as a result of the lack of an effective means to limit the infection level of young trees that actively flush all year long.

The current emergency exemption, File symbol 16FL04, expires October 31, 2016. As both the Belay registration status and the current emergency condition surrounding this situation remain unchanged at this time, we are requesting a continuation of this exemption to assist with the management of the Asian Citrus Psyllid (and subsequent management of HLB). This insect pest/vectored disease remains an urgent, non-routine problem in Florida that if not controlled will negatively affect the economic viability of Florida's citrus industry and jeopardize the future of Florida's overall citrus and citrus processing businesses.

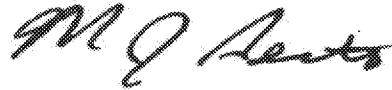
A label expansion for this active ingredient to allow this use was petitioned for by Valent U.S.A., Corporation (with tolerance data provided by the IR-4) more than six years ago. The petition has been reviewed and remains "on hold" because of pending litigation concerning the original registration of this active ingredient and its alleged impact on bees. Keep in mind that the use pattern and application methodology requested under this petition were developed to minimize direct impacts to bees and other pollinators. The potential for indirect exposure created through exposure to nectar of treated trees is also minimized because of application timing restrictions to reduce potential levels of the active ingredient during the citrus bloom period that is important to the beekeeping and honey industries. The Florida Department of Agriculture and Consumer Services has also been actively engaged with the citrus and bee industries in a cooperative

communication process, and developed a program to provide guidance to these industries in their efforts to ensure mutually beneficial practices for the continued production of citrus and the health of honey bees that visit citrus groves.

Assuming 100 percent of the eligible young citrus trees of all sizes are treated with the maximum number of Belay applications allowed, the maximum amount of clothianidin/Belay used in this young tree protection program would total approximately 25,036.8 pounds of active ingredient or 11,754 gallons of formulated Belay 2.13 SC Insecticide.

Thank you in advance for your attention to this matter. If you or anyone else within the Department has any questions regarding this request, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "M J Aerts".

Michael J. Aerts  
Director; Production and Supply Chain Management